

Douglas F. Cushnie
P.O. Box 500949
Saipan MP 96950
Telephone: (670) 234-6830
Facsimile: (670) 234-9723
E mail: abogados@pticom.com

Attorney for Plaintiffs

UNITED STATES DISTRICT COURT
FOR THE
NORTHERN MARIANA ISLANDS

LAW OFFICE OF

DOUGLAS F. CUSHNIE,
a sole proprietorship, and
DOUGLAS F. CUSHNIE,
individually,

Plaintiffs,

v.

BANK OF HAWAII, and
MARY ROE and JOHN DOE,

Defendants.

CIVIL ACTION NO. 07-0020

PLAINTIFF'S INITIAL
DISCLOSURES

Come now plaintiffs herein pursuant to Rule 26(a) F.R.C.P. and LR 16.2CJ d, and
file this, their Initial Disclosure.

1. Persons Likely To Have Discoverable Information.

a. Douglas F. Cushnie - Forging of endorsements, identification of checks
and bank accounts, damages.

b. Lucy M. DL Guerrero - Forging of endorsements, securing of checks,
false billings, negotiation of checks.

2. Documents Plaintiffs May Use To Support Their Claims.

a. Checks issued by Commonwealth Ports Authority to plaintiffs.

b. Checks issued by Commonwealth Superior Court to plaintiffs.

c. Checks issued by AHPW, Inc., and U Corp. to plaintiffs.

1 d. Checks issued by other clients of plaintiffs to plaintiffs.

2 Checks under items 2. a and b, above have been provided to defendant Bank
3 of Hawaii.

4 3. Checks paid on forged endorsements will be calculated together with
5 prejudgment interest on each check from the date of payment by the bank.
6 Damages for emotional distress, loss of reputation, and so forth are not
7 susceptible of precise calculation.

8 4. Plaintiff is not aware of insurance policies that may be maintained by the bank.

9 Dated this 14th day of March, 2008.

10 DOUGLAS F. CUSHNIE
11 Attorney for Plaintiffs

12 /s/
13 _____ DOUGLAS F. CUSHNIE F 108